

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

PCF INSURANCE OF THE WEST, LLC,

Plaintiff,

v.

JAMES FRITTS, RI INSURANCE
SERVICES LLC,

Defendants.

-and-

JAMES FRITTS, RI INSURANCE SERVICES,
LLC, a Washington limited liability company,
and CHICKEN DINNER INC., a Washington
corporation,

Counterclaim Plaintiffs,

v.

PCF INSURANCE SERVICES OF THE
WEST, LLC, a Delaware limited liability
company; PCF HOLDCO, LLC, a Delaware
limited liability company;

Counterclaim Defendants.

Case No. 2:23-cv-1468-JCC

STIPULATED MOTION FOR ORDER
EXTENDING TIME TO RESPOND TO
COUNTERCLAIMS

Pursuant to Fed. R. Civ. P. 6(b)(1)(A) and 7, Plaintiff/Counterclaim Defendant PCF Insurance Services of the West, LLC (“PCF”), Counterclaim Defendant PCF Holdco LLC (“Holdco” and, together with PCF, “Counterclaim Defendants”), and Defendants/Counterclaim Plaintiffs James Fritts (“Fritts”) and RI Insurance Services, LLC (“RI”), and Counterclaim Plaintiff Chicken Dinner Inc. (“Chicken Dinner” and, together with Fritts and RI, “Counterclaim Plaintiffs”), hereby submit this Stipulated Motion for Order Extending Time To Respond To Counterclaims. Good cause for such an order appears as follows:

1. On September 16, 2024, Fritts and RI filed an Answer to the Second Amended Complaint and Counterclaims, adding new parties, including Counterclaim Defendant, PCF Holdco LLC and Counterclaim Plaintiff, Chicken Dinner Inc. The Counterclaims were served on PCF Holdco LLC on September 17, 2024.

2. Given the addition of new parties and the complexity of the claims and issues raised in the Counterclaims, the parties agree that an extension of time for Counterclaim Defendants to answer, move, or otherwise respond is warranted. The parties also agree to extend Counterclaim Plaintiffs’ deadlines under Fed. R. Civ. P. 15(a)(1)(B) and Local Rule 7(d).

STIPULATION

The undersigned are counsel of record for all Counterclaim Plaintiffs and Counterclaim Defendants (the “Parties”). The Parties hereby stipulate to the following deadlines:

- 1) Counterclaim Defendants’ deadline to respond to the Counterclaims shall be extended until **October 21, 2024**;
- 2) Counterclaim Plaintiffs’ deadline to oppose any such motion to dismiss under Local Rule 7(d) or to file an amended pleading pursuant to Rule 15(a)(1)(B) shall be extended until **November 25, 2024**;
- 3) By entering this stipulation, PCF Holdco LLC does not waive and expressly reserves the right to assert the defense that the Court lacks personal jurisdiction over it.

1 DATED this 4th day of October, 2024.

2 PAUL HASTINGS LLP

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6 /s/ John S. Darden

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West, LLC and Counterclaim Defendant
PCF Holdco, LLC*

~~PROPOSED~~ ORDER GRANTING STIPULATED MOTION

Based on the foregoing stipulation of the parties, and good cause appearing, the Court hereby GRANTS the Stipulated Motion. Counterclaim Defendants' deadline to answer, move, or otherwise respond to the Counterclaims shall be extended until **October 21, 2024**; Counterclaim Plaintiffs' deadline to oppose any motion to dismiss under Local Rule 7(d) or to amend its pleading under Rule 15(a)(1)(B) shall be extended until **November 25, 2024**.

IT IS SO ORDERED.

DATED: October 4, 2024

A handwritten signature in black ink, reading "John C. Coughenour", written over a horizontal line.

Hon. John C. Coughenour

United States District Judge